IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

NATIONAL RIFLE ASSOCIATION OF	§
AMERICA,	§
	§
Plaintiff and Counter-Defendant	§
	§
and	§
	§
WAYNE LAPIERRE,	§
,	§ Civil Action No. 3:19-cv-02074-G
Third-Party Defendant,	§
,	\$ \$
V.	
	§
ACKERMAN MCQUEEN, INC.,	§
Telemini inequality inten	§
Defendant and Counter-Plaintiff,	§
Defendant and Counter Training,	§
MERCURY GROUP, INC., HENRY	§
MARTIN, WILLIAM WINKLER,	§
MELANIE MONTGOMERY, and JESSE	§
GREENBERG,	§
GREENDERG,	§
Defendants.	§
Defendants.	§

MOTION TO COMPEL AND FOR SANCTIONS

Plaintiff National Rifle Association of America (the "NRA") hereby files, through the undersigned counsel, the instant Motion to Compel and Motion for Sanctions against Defendants. Accompanying this Motion is a Memorandum of Law In Support Thereof. In that Memorandum of Law the NRA's sets forth multiple violations of Federal Rule of Civil Procedure 34 committed by Defendants and demonstrates the need to strike objections and compel the production of documents. In addition, the Memorandum sets forth the factual record of Defendants' repeated pattern of extreme violations of the discovery rules, including, among other things, Defendants'

failure to satisfy Defendants obligation to meet and confer with the NRA over the substance of

their responses.

WHEREFORE, for good cause shown in the submissions filed with the Court, the NRA

request the following relief:

1. An order striking or overruling of all of Defendants' General Objections

2. An order compelling production of all documents in light of the overruling of the

General Objects and in response to the multiple, specific Requests for Product

discussed in the memorandum.

3. An order sanctioning Defendants for the reasons set forth in the Memorandum

pursuant to Fed. R. Civ. P. 37(d).

Dated: January 22, 2019

Respectfully submitted,

BREWER, ATTORNEYS & COUNSELORS

By: /s/ Jason C. McKenney

Michael J. Collins State Bar No. 00785493 mjc@brewerattorneys.com Jason C. McKenney State Bar No. 24070245

jcm@brewerattorneys.com

1717 Main Street, Suite 5900

Dallas, Texas 75201

Telephone: (214) 653-4000 Facsimile: (214) 653-1015

ATTORNEYS FOR THE PLAINTIFF-COUNTER-DEFENDANT NATIONAL RIFLE ASSOCIATION OF AMERICA

2

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was electronically

served via the Court's electronic case filing system upon all counsel of record on this 22nd day of

January 2019:

/s/ Jason C. McKenney

Jason McKenney

3